UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

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SR-6J

MEMORANDUM

DATE: September 4, 2013

SUBJECT: Review of the Quality Management Plan (QMP) prepared by

SESCO, Inc. for Kokomo Dump Superfund Site, Indiana

FROM: Ida Levin,

Remedial Response Section 2

TO: Shelly Lam, On-Scene Coordinator

I have reviewed the QMP prepared by SESCO, Inc. for Kokomo Dump Superfund Site, IN. The document was received on August 13, 2013 (SF Log-in No.4286).

The following itemize the QMP deficiencies:

1. Management and Organization

- a. The QMP should be signed and dated by all approval senior management personnel, including QA manager.
- b. The documents used for the QMP preparation should be referenced (EPA Requirements for Quality Management Plans (QA/R-2), EPA/240/B-01/002 March 2001 Reissued May 2006) and American National Standard ANSI/ASQ E4-2004
- c. Organizational chart should identify all components of organization: identify position of Quality Program Manager, identify lines of reporting of the Quality Program manager and identify any other QA staff. Submitted organizational chart does not include Quality Program Manager.
- d. This section should describe in details the responsibilities of Quality Program Manager.
- e. The QMP should describe process for resolving disputes.

2. Quality System Components

- a. This section of the QMP should describe in more details the principal quality system components (e.g., quality system documentation, annual reviews and planning, project-specific quality documentation) applicable to SESCO.
- b. Description of components should include more details how they are implemented and the role Quality Assurance manager in implementation of these components.
- c. This document should identify who is preparing, reviewing and approving QMP.
- d. EPA Requirements for QAPPs (QA/R-5), EPA/240/B-01/003 Reissued May 2006 and the UFP-QAPP format should be referenced in this section of the QMP. The information for

3. Procurement of Items and Services

a. The detail process for review and approval of suppliers quality related documentation (QAPPs, QMP) should be included in the QMP.

4. Documents and Records

- a. This section of QMP should describe in more details process for removal of obsolete documentation.
- b. The QMP should describe process for preparing, reviewing, approving, issuing, using and revising documents and records.
- c. The QMP should describe the process for ensuring that records and documents accurately reflect completed work.
- d. The process for establishing and implementing appropriate chain of custody and confidentiality procedures for evidentiary records should be described in the QMP.
- e. The roles, responsibilities and authorities of personnel responsible for the documentation and records should be identified in the QMP.
- f. The record retention time for QA documentation should follow EPA requirements.

5. Computer Hardware and Software

a. The QMP should describe in more details process for developing, installing, testing, using, maintaining, controlling, and documenting computer hardware and software.

6. Planning

a. EPA Requirements for QAPP (QA/R-5) and the UFP-QAPP format should be referenced in this section of the QMP.

7. Implementation of Work Processes

a. This section of QMP should describe process for preparation, review, approval, revision and withdrawal of Standard Operating Procedures (SOPs).

8. Assessment and Response

a. The process for documenting assessment and reporting the results to management should be described in details.

9. Quality Improvement

- a. This section should describe the process for encouraging staff to establish communications between customers and suppliers, identify process improvement opportunities, and identify and propose solution for problems.
- b. It should be identified in the section, if the reanalysis of the samples are not possible due to holding time, the resampling will be performed.